



COMHAIRLE CONTAE
CHEATHARLACH

CARLOW COUNTY COUNCIL

Recommendation of the European Parliament and the Council Providing for
the Minimum Criteria for Environmental Inspections in Member States
(2001/331/EC)

Inspection & Compliance plan under RMCEI 2023

Note from the Director:

The RMCEI Report outlines the planned activities, of Carlow County Council in 2023. The activities are aligned with the EPA's National Enforcement Priorities 2022 - 2024, issued in December 2022, to provide defined objectives and specified outcomes to be achieved over this time.

As Director of Service for this section I am happy to state that we have in place the team and the dedication to staff to achieve our objectives to protect the local environment for future generations to come.

Acknowledgments:

Large tasks such as this are accomplished with the help of our multi-disciplinary team over the course of 12 months, it is imperative that this dedication, commitment, and hard work must be acknowledged as without this devoted team it would neither be possible to produce the RMCEI Plan nor implement it. Our Clerical and Administration Team must also be acknowledged for their record keeping, administrative support, support to the public and generally keeping the team's objectives on point. Gratitude must also be expressed to the Environmental Patrol Officers, Scientists and Engineers for completing investigations, inspections and working to ensure a safer compliant environment. Our Environmental Awareness Officer must also be credited for communicating our message to communities and assisting the team when required. Finally, thanks must be given to the Environmental Services Team for ensuring the safe operation of authorised facilities in the County, while sharing their knowledge and providing a relentless willingness to help customers.

Approved by Directors of Services



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Position: Director of Services, Transport, Environment, Water Service, Building Control & Emergency Services

Date of Approval: 27/2/23



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Glossary/Definitions

Activity - The aim of the activity should be to achieve the intermediate outcomes and/or the final environmental outcome associated with the National Priority

Additional Intermediate outcome – Other outcomes, identified by a Council, outside those that have been specified by the EPA in the RMCEI Return template

AA – Appropriate Assessment

AER – Annual Environmental Return

AR – Annual Return

ATF – Authorised Treatment Facility (processing of ELVs);

Baseline - To measure the progress in achieving the intermediate outcome over time, a baseline value must be established. Data gathered in subsequent years can then be compared to the baseline value in order to measure progress towards achieving the intermediate outcome.

C&D – Construction & Demolition (Waste);

CCMA – County & City Management Association;

CEMP - Construction Environmental Management Plans

CoR – Certificate of Registration;

DAFM – Department of Agriculture Food & Marine;

DECC – Department of the Environment, Climate Action & Communications;

DHPLH – Department of Housing, Planning, Local Government and Heritage;

DWWTS – Domestic Wastewater Treatment System;

Environmental inspection according to RMCEI includes:

- site visits,
- monitoring achievement of environmental quality standards,
- consideration of environmental audit reports and statements,
- consideration and verification of any self-monitoring carried out by or on behalf of operators of controlled installations,
- assessing the activities and operations carried out at the controlled installation,
- checking the premises and the relevant equipment (including the adequacy with which it is maintained) and the adequacy of the environmental management at the site,
- checking the relevant records kept by the operators of controlled installations.

ELV – End of Life Vehicle;

EPA – Environmental Protection Agency;

Final Environmental Outcome - is a measurable change in the environment, e.g. cleaner air or improved water quality

FPN – Fixed Payment Notice

GAP – Good Agricultural Practice for the protection of waters Regulations;

LAWPRO – Local Authority Waters Programme;

Metric – A metric is a way of measuring the progress to achieving the intermediate outcome or the objective

NIECE – Network for Ireland's Environmental Compliance & Enforcement;

NIP – National Inspection Plan;

Non-routine inspection – an inspection carried out in such cases in response to complaints, in connection with the issuing, renewal or modification of an authorisation, permit or licence, or in the investigation of accidents, incidents and occurrences of non-compliance.

PAA – Priority Action Area

RMCEI

PMDS – Performance Management Development System;

PRI/EPRI – Producer Responsibility Initiative or EPRI Extended Producer Responsibility Initiative;

PTU – Pay to Use

RBMP – River Basin Management Plan;

RMCEI – EU Recommendation on Minimum Criteria for Environmental Inspections;

Routine inspection – an inspection carried out as part of a planned inspections programme, e.g. scheduled inspection of a permitted facility, scheduled monitoring of a licensed discharged; compliance assessment of a regulated facility, etc.

Small Private Supply – SPS

Specified Intermediate outcome – Those intermediate Outcomes specified by the EPA in the RMCEI Return template

TARGET - Once the baseline is established, the goal should be to reduce/increase the baseline value over time, thereby achieving the intermediate outcome. A target is the value to which the baseline value is aimed to be reduced (or increased) to for that year. A qualitative target can be developed where a baseline has not been established or targets may also be set centrally to ensure a consistent approach to achieving an intermediate outcome/objective”

VOC – Volatile Organic Compounds;

WEEE – Waste Electrical & Electronic Equipment;

WERLA – Waste Enforcement Regional Lead Authority;

WFD – Water Framework Directive;

WFP – Waste Facility Permit.

WMP – Waste Management Plan

WRMP – Waste Resource Management Plan

1. Introduction

1.1 Plan Details

Table 1: Plan Details

Geographic Area	County Carlow 894km ²
Population	61,931
Calendar Year	2023
RMCEI Coordinator Name and Position	Eleanor McDonald, Executive Scientist

1.2 Expected Known Once-Off Challenges that may be Faced in Implementation of this Plan

Table 2 Expected Known Once-Off Challenges that may be Faced in Implementation of this Plan (if any) & how these will be Addressed

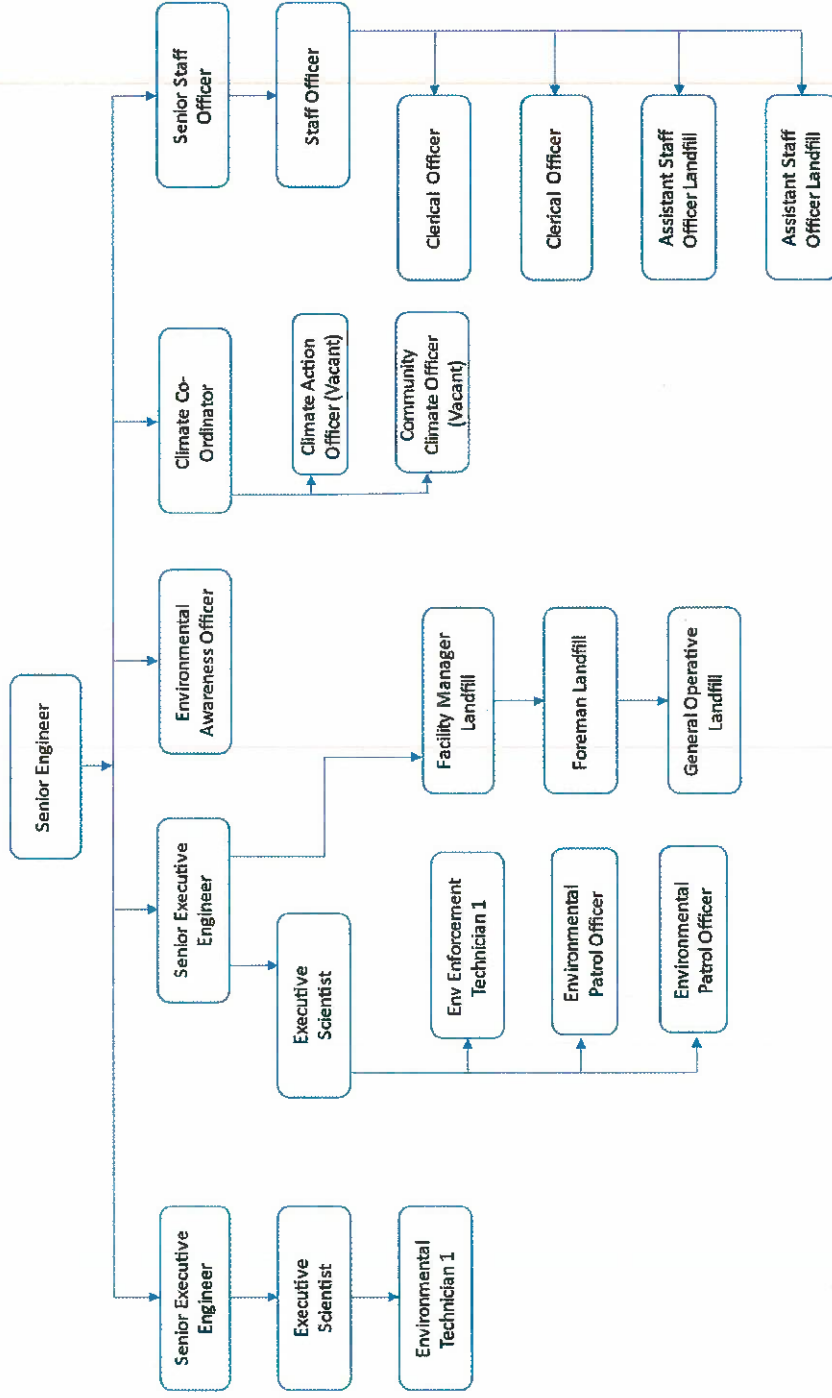
Description of known challenge and outline of how these will be addressed
<p>1. Staff Vacancies/reassignments</p> <p>A number of positions arose in addition to assignments in 2022 which have since been resolved. These include the following:</p> <ul style="list-style-type: none"> Advertising and filling of new position of Climate Action Coordinator in March 2022. The successful candidate was in the position of Environmental Awareness Officer and carried out both duties until the Environmental Awareness Officer position was filled in September 2022. The new Environmental Awareness Officer has extensive experience in biodiversity. The Staff Officer secured a promotion to Carlow County Council Housing Department. This role was advertised and filled in November 2022. The newly appointed Staff Officer has experience in Environmental Waste Management, supervision of TFS exporting, Waste collection day planning, farm hazardous waste collection, compilation of waste data, waste management regulations, QEHS Coordination including a working knowledge of ISO 45001 (H&S), 90011 (Quality), 14001 (Environment) standards. <p>Two new positions will be filled in 2023 (1) Climate Action Officer and (2) Community Climate Officer. It is proposed to advertise these roles in Q2 of 2023. These two new staff will work closely with the Climate Co-Ordinator and the Environmental Awareness Officer.</p> <p>All new staff are registered on NIECE and required to attend WERLA/SWMO/CARO operation meetings. It is anticipated that due to the staff changes outlined above there will be a steep learning curve and requirement for staff to upskill during 2023 developing firm building blocks for 2023 and after.</p> <p>2. Sustainable Development Goal Champions</p> <p>Carlow County Council's role as Sustainable Development Goal Champion has been extended to 2023. Carlow County Council are delighted to continue in this role as SDG Champion and while there has been considerable resource requirements to develop and support the role, it has been a great opportunity to promote and embed the SDG's. Carlow County will continue to translate the SDG's into all our actions in Environment such that they become the way we do things.</p>

1.3 Staff Structure

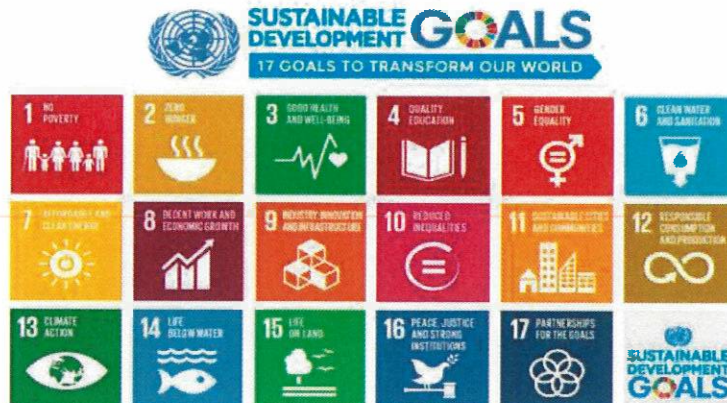
The Environment Department falls under the guardianship of the Director of Transport, Infrastructure, Environment, Climate Action and Emergency Services. Environmental Services include Environmental Protection & Enforcement, Climate Action, Energy and Agriculture which are the responsibility of the Senior Engineer for Water Services, Environment and Climate Action. The section is stewarded by two Senior Executive Engineers covering Water and Waste respectively and their technical teams are strongly supported by the Administrative team. The Environmental Awareness Officer sits between both Water and Waste Teams. Their role while strongly weighted towards waste is pivotal to both sub teams.

Further detail on available staff resources are provided in Section 4.>

Figure 1 Council Organogram



1.4 Sustainable Development Goals



The Sustainable Development Goals (SDGs), also known as the Global Goals, were adopted by all United Nations Member States in 2015 as a universal call to action to end poverty, protect the planet and ensure that all people enjoy peace and prosperity by 2030 and beyond. These goals include an ambitious set of targets and cover policy areas such as protection of the environment, economic development, poverty eradication, access to health and education services, gender equality, peaceful societies and human rights.

The Department of Environment, Climate Action & Communications were assigned responsibility for preparing the SDG National Implementation Plan and the Voluntary National Review. The Plan was published in 2018 and as part of the implementation strategy Carlow County Council was appointed SDG Champion for the period 2019 -2020. Due to COVID 19, this period has been extended until Q2 2021. Carlow County Council will then undertake the role of SDG Ambassador which will involve supporting the new Champions in their endeavours.

The Department of Environment, Climate Action & Communications assigned the following goals to Carlow County Council for the lifetime of the programme.

- SDG 1 No Poverty,
- SDG 6 Clean Water & Sanitation,
- SDG 7 Affordable & Clean Energy,
- SDG 11 Sustainable Cities & Communities,
- SDG 12 Responsible Consumption & Production and
- SDG 13 Climate Action.

As SDG Champions, Carlow County Council have undertaken to

- Act as leaders through raising public awareness of our SDG's.
- Translate the SDG's into practical action at local level.
- Promote the chosen SDG's through local, regional and national initiatives and events.
- Work in partnership with individuals and organisations both locally and nationally promoting the SDG's

The 17 goals are intrinsically intertwined, and the achievement of targets and goals are interdependent, underpinned by Goal 17 Partnership for the Goals. Our ambitious work plan includes implementing the framework and translating, in a practical way, the process of achieving the objectives of the goals through our policies and plans. Implementation of the National Waste Priorities through the Inspection & Compliance plan under RMCEI is recognised as core part of our role as SDG Champions.

2. Priorities for Environmental Enforcement for the Year Ahead

2.1 National Environmental Enforcement Priorities for the Year Ahead

National Enforcement Priorities (NEPs) for the Year ahead have been communicated in the letter sent to each Council and is available on the NIECE portal (accessed via <https://www.niece.ie/Topics/RMCEI.aspx>).

Water

- Pressures from Agriculture (Farm Yards)- slurry/soiled water collection and storage
- Pressures from Agriculture (Farmland) - slurry and fertiliser spreading
- Domestic Waste Water Treatment Systems / Septic Tanks
- Discharge Licences / Misconnections
- Local Priorities and Water Quality Monitoring

Air

- Air Quality Monitoring Activities and Data Use
- Solid Fuel Inspections
- Environmental Noise Directive (END) Activities
- Air & Noise Control (including Planning)
- Ongoing Air & Noise Enforcement Work

Waste

- Tackling Illegal Waste Activities and Multi-Agency Sites/Operators of Concern
- Construction and Demolition Waste
- End-of-Life Vehicles and Metals
- Household and Commercial Waste
- Producer Responsibility Initiatives and additional local priorities

In conjunction with the NEPs set by the EPA, Carlow County Council also incorporate the following into the work plan for the year ahead:

- The WERLA programme of co-ordinated work for the year in question and relevant sections of Regional Waste Management Plan.
- Ongoing enforcement work carried over from 2023 for Waste, Water, Air and Noise.
- The requirement for Councils to consider carrying out local catchment assessments (upstream of priority areas for action) and allow time for catchment assessment data entry into the WFD IT Application/ participation in Regional Characterisation Workshops.

Table 3 National Environmental Priorities Checklist

Ref. No	National Environmental Priorities	Have you completed a National Priority Template for this Priority (Appendix A)?		Where you have answered 'No' please provide a comment to explain.
		Yes	No	
1.0	Water - Improving Water Status in all waterbodies			
1.1	Pressures from Agriculture (Farm Yards)- slurry/soiled water collection and storage	✓		
1.2	Pressures from Agriculture (Farmland) - slurry and fertiliser spreading	✓		
1.3	Domestic Waste Water Treatment Systems / Septic Tanks	✓		
1.4	Discharge Licences / Misconnections	✓		
1.5	Local Priorities and Water Quality Monitoring	✓		
2.0	Air - Protecting public health and to improve and maintain air quality			
2.1	Air Quality Monitoring Activities and Data Use	✓		
2.2	Solid Fuel Inspections	✓		
2.3	Environmental Noise Directive (END) Activities	✓		
2.4	Air & Noise Control (including Planning)	✓		
2.5	Ongoing Air & Noise Enforcement Work	✓		
3.0	Waste - Improving waste management and protecting our environment			
3.1	Tackling Illegal Waste Activities and Multi-Agency Sites/Operators of Concern	✓		
3.2	Construction and Demolition Waste	✓		
3.3	End-of-Life Vehicles and Metals	✓		
3.4	Household and Commercial Waste	✓		
3.5	Producer Responsibility Initiatives and additional local priorities	✓		

2.2 Ongoing RMCEI/Local Priorities

Table 4 (i) Additional Local Priorities

Local Priorities	Yes	No	Where you have answered 'No' please provide a reason why
Are additional local priorities included in the Plan for the year ahead?	√		

Table 5 (ii) Work Planned with Regional Lead Authorities

Authority	Plans for the Year ahead
Environmental Protection Agency - EPA	See priority table
Waste Enforcement Regional Lead Authorities - WERLA	Examples include
Local Authority Waters Programme – LAWPRO	<ul style="list-style-type: none"> • WERLA - Anti-dumping initiative, • LAWPRO - Facilitating grant applications on behalf of several groups and supporting them in the implementation of their plans.
Department of Agriculture, Food and the Marine - DAFM	
Department of the Environment, Climate and Communications - DECC	

3. Risk Assessment

Carlow County Council has expanded the RMCEI Resource and Risk Rating tool in 2023 to develop an Inspection Plan and Tracking tool. The Inspection Plan and Tracking tool includes additional tabs for risk rating of the following identified facilities in County Carlow:

1. Permitted Waste Facilities incl. ATF's
2. Certificate of Registration sites
3. Sludge Handling Facilities
4. Waste Collection Permits
5. Suspected unauthorised ELV Sites
6. Small Private Supplies
7. Group Water Schemes
8. Bottle Bank Sites
9. Discharge Licences
10. Deco Paints
11. Solvents
12. Tyres
13. Petroleum Vapours
14. Solid Fuel Retailers

Each facility/installation type is risk rated according to multiple factors unique to each facility/installation type which are specifically identified on each individual tab. Each tab for each facility/installation clearly identifies the number, location and operator of each facility/installation type.

All facilities and installations have been assessed using the risk rating tool and placed into the following categories:

Category A: Large installations with significant associated environmental risk or those with poor compliance histories.

Category B: Medium sized installations with lesser risk of environmental pollution.

Category C: Small Installations with good compliance record.

As the risk rating spreadsheets clearly names and identify owners, premises, compliance and operational history including activities/monitored results these will not be included with this public document for GDPR purposes. This spreadsheet will be securely maintained and only available to staff working in enforcement in Carlow County Council and to the EPA for audit purposes.

The risk rating tool has been used to identify and outline how the installations are selected for inspection for the year ahead and the information on the risk rating tool with regards to installation type and risk feeds directly into the planned inspection plan included on the risk rating tool.

No specific direction has yet been provided for 2023 by lead authorities to undertake additional inspections to those planned of specific regulated sites (e.g. WERLA request certain sites to be inspected or if all ELV sites are required to be inspected or LAWPRO require certain inspections/follow-up in areas for action) as yet however the Inspection Plan tool incorporating the risk rating of all 14 facility types above allows for quick adaptation.

The risk rating of facilities known in Carlow has been linked directly to the planned inspections sheet and allows for amendments to be made to the planned programme where directions are received with efficiency and due regard to overall plan and available resources. The number of inspections per facility risk rating can be changed quickly and the spreadsheets automatically update the inspection programme based on new data entered, highlighting immediately if additional resources are required.

Each individual tab for facility type provides details on how the risk has been rated. For consistency the recommended RMCEI Resource and Risk Rating tool provided by the EPA has been taken as the basis for the development of the expanded Inspection Planning and Tracking tool in Carlow.

Table 6 on the selection of sites for assessment in the year ahead is populated based on the Planned Inspection and Tracking Tool developed and is risk based.

Table 6 Selection of Sites for Assessment in the Year Ahead

Type of Regulated Installation (i.e. Discharge Licences/ Waste Permit Facilities / Certificate of Registration)	Total No. of Installations in your functional area	Total No. of Installations in your functional area Per Risk Category			No. of Inspections Planned Per Risk Category ¹			Total No. of Inspections Planned	Additional Comment (e.g. include rationale for selection of sites to be inspected and/or indicate whether any of the inspections planned include installations that have been recommended for inspected by Lead Authorities)
		A	B	C	A	B	C		
		7	3	1	4	3	2		
Waste Facility Permits									
3	1	1	4	3	2	9	Risk rating based on past compliance, complaints, refer to Carlow Risk Rating Tool 2023		
Authorised ELV sites (ATFs)									
4	0	3	1	4	3	2	11	Risk rating based on past compliance, complaints, refer to Carlow Risk Rating Tool 2023	
Certificate of Registration									
29	1	6	22	4	2	1	38	Risk rating based on past compliance, complaints, refer to Carlow Risk Rating Tool 2023	
Waste Collection Permits									
2	0	2	0	3	2	2	4	Risk rating based on past compliance, complaints, refer to Carlow Risk Rating Tool 2023	
Sludge Handling Facility									
7	0	2	5	3	2	2	14	Risk rating based on past compliance, complaints, refer to Carlow Risk Rating Tool 2023	
Discharge Licences									
28	1	8	19	52	24	12	472	Risk rating based on past compliance, complaints, refer to Carlow Risk Rating Tool 2023	
LA Bottle Banks									
55	0		55	0	2	110	Risk rating based on past compliance, complaints, refer to Carlow Risk Rating Tool 2023		
Small Private Supplies									
14	2	1	1	5	3	1	14	Risk rating based on past compliance, complaints, refer to Carlow Risk Rating Tool 2023	
Group Water Schemes									
26	0		25	0	0	1	26	Risk rating based on past compliance, complaints, refer to Carlow Risk Rating Tool 2023	
Petroleum Vapours									

¹ Unless directed otherwise

Solvents	6	0	0	6	0	0	1	6	Risk rating based on past compliance, complaints, refer to Carlow Risk Rating Tool 2023
Deco paints	7	0	4	3	0	2	1	11	Risk rating based on past compliance, complaints, refer to Carlow Risk Rating Tool 2023
Tyres	54	0	0	54	0	54	1	54	Risk rating based on past compliance, complaints, refer to Carlow Risk Rating Tool 2023
Solid Fuel Retailers	25	0	0	25	0	0	1	25	Risk rating based on past compliance, complaints, refer to Carlow Risk Rating Tool 2023
Total No. Of Inspections Planned								817	

4. Resource Assessment for the Year Ahead

4.1 Review of the Achievement of the Previous Years Inspection Targets

Table 7 below summarises the achievements of 2022. A full and detailed examination of 2022 performance has been completed in the Inspection Planning and Tracking Tool excel sheet under tab "Planned Inspections 2023". Each individual target has been evaluated in this tab and revisions to planned inspections for 2023 individually considered. This excel sheet has been provided to the EPA for audit purposes but is not available for public viewing under GDPR as individual premises, operators and staff members details are provided in the tool for resource planning and risk rating.

Figures reported upon, within Table 7, are the Sub Totals that were provided in the Councils RMCEI return for the previous year.

Differences between planned and completed are considered significant if the completed number of inspections is greater or less than 25% of the planned inspections.

The table also gives a brief high-level explanation of any significant differences in the number of inspections Carlow County Council planned in the previous year versus what was completed in the previous year.

As the Inspection Planning and Tracking Tool excel sheet tab "Planned Inspections 2023" demonstrates the Plan for the year ahead identifies and addresses last year's under/over estimation of planned (routine and non-routine) inspections.

Table 7 Review of Previous Years Inspections

Inspection Type <i>Figures available from your RMCEI return (Section 6) or previous years RMCEI plan</i>	No. of Planned Inspections set out at the start of the Previous Year	No. of Completed Inspections at the end of the Previous Year	Outline any reason for significant difference in completed versus planned figures (i.e. +/- 25%)	Please provide a brief narrative to demonstrate that the previous years completed inspections have been considered when planning the inspections for the year ahead
Routine Waste Inspections	787	996	6.1.4 ↑ due to littering at bring banks. 6.1.8 ↑ due to higher number of controlled burning applications for agriculture. 6.1.10 ↑ due to increased complaints	Carlow Inspection Planning and Tracking Tool examined 2022 performance on each inspection type and adjustments have been made accordingly. See Tracking Tool for 2023 for details.
Non-Routine Waste Inspections	90	60	6.2.1 ↓ as complaints lower than expected. 6.2.3 no sites notified by NTFSO. 6.2.9 ↓ as number of backyard burning complaints were recorded in 6.7.1 incident/complaint related inspections for air/noise.	Carlow Inspection Planning and Tracking Tool examined 2022 performance on each inspection type and adjustments have been made accordingly. See Tracking Tool for 2023 for details.
Routine Litter Patrols/Investigations	1024	1028		Carlow Inspection Planning and Tracking Tool examined

Inspection Type <i>Figures available from your RMCEI return (Section 6) or previous years RMCEI plan</i>	No. of Planned Inspections set out at the start of the Previous Year	No. of Completed Inspections at the end of the Previous Year	Outline any reason for significant difference in completed versus planned figures (i.e. +/- 25%)	Please provide a brief narrative to demonstrate that the previous years completed inspections have been considered when planning the inspections for the year ahead
				2022 performance on each inspection type and adjustments have been made accordingly. See Tracking Tool for 2023 for details.
Routine Water/Wastewater Inspections	516	446	6.4.3 planned for 114 inspections. This should not have been included as it is carried out by EPA.	Carlow Inspection Planning and Tracking Tool examined 2022 performance on each inspection type and adjustments have been made accordingly. See Tracking Tool for 2023 for details.
Non-Routine Water/Wastewater Inspections	16	44	6.5.3 ↑ due to complaints of alleged unauthorised discharges.	Carlow Inspection Planning and Tracking Tool examined 2022 performance on each inspection type and adjustments have been made accordingly. See Tracking Tool for 2023 for details.
Routine Air/Noise Inspections	76	89		Carlow Inspection Planning and Tracking Tool examined 2022 performance on each inspection type and adjustments have been made accordingly. See Tracking Tool for 2023 for details.
Non-Routine Air/Noise Inspections	5	20	6.7.1 ↑ due to backyard burning and sandblasting complaints	Carlow Inspection Planning and Tracking Tool examined 2022 performance on each inspection type and adjustments have been made accordingly. See Tracking Tool for 2023 for details.
Routine producer Responsibility Inspections	75	139	6.8.3 ↑ due to increase in number of suspected vehicle importers. 6.8.6 ↑ due to increase in number of suspected packaging major producers. 6.8.8 ↑ due to increase in number of suspected tyre retailers.	Carlow Inspection Planning and Tracking Tool examined 2022 performance on each inspection type and adjustments have been made accordingly. See Tracking Tool for 2023 for details.
Planning inspections	518	218	6.9.2 ↓ as Planning Dept asked not to refer matters that does not require comment from Env. Dept and also asked not to refer repeat type matters.	Carlow Inspection Planning and Tracking Tool examined 2022 performance on each inspection type and adjustments have been made accordingly. See Tracking Tool for 2023 for details.

4.2 Number of Staff Days Available

Table 8 below identifies the resources available for 2023 to undertake the required work of Carlow County Council Environment Team for the year ahead. The template identifies the available resources to undertake the work mapped out for the year ahead, identifying what National Priority the resource will be assigned to and the days available for each resource to complete all work required under RMCEI.

The basis/method used for calculating the available days available for each resource has considered the number of days available for work on RMCEI (routine and non-routine) considering other duties assigned by the local authority, whether full time/part time, meetings/training to be attended in the course of the year and whether the resource is availing of other leave including maternity, paternity or parental leave. For this reason, it is not appropriate to provide the details in this table as to how the number of days available has been calculated for each individual in accordance with GDPR. These details are provided in the Inspection Planning and Tracking Tool which will be provided separately to the EPA for audit purposes only.

Carlow County Council is satisfied that the days available for each resource have been assessed and are reflective of available staff resources at time of planning.

Table 8 Resources Available to undertake required Work for the Year Ahead

Department	Available Resources	Name	Focus Area for this Resource (please ensure you outline which National Environmental Priority area this resource will be associated with)	Available days for RMCEI (both routine and non-routine)	Basis of calculating Resource Available days (take account of e.g. job-sharing, full/part-time working, expected leave, secondment to other work areas and therefore unavailable, basis for a standard working year e.g. 220 days)
Water Services & Environment	Senior Engineer	Confidential	All	20	Management of Environment & Water Services Department
Environment	Senior Executive Engineer	Confidential	Waste	50	Full time
Environment	Senior Executive Engineer	Confidential	Water/Waste	10	Full time
Environment	Executive Scientist	Confidential	Water	160	Full time
Environment	Executive Scientist	Confidential	Waste/Air/Noise	157	4.5 day week
Environment	Environmental Technician Grade 1	Confidential	Water/Waste/Air/Noise	160	Full time
Environment	Environmental Patrol Officer	Confidential	Waste	200	Full time
Environment	Environmental Patrol Officer	Confidential	Waste	200	Full time
Environment	Environmental Awareness Officer	Confidential	Waste	5	Full time
Environment	Staff Officer	Confidential	Water/Waste/Air/Noise	10	Complete – Full time

Environment	Clerical Officer	Confidential	Water/Waste/Air/Noise	10	Complete – Full time
Landfill	Environmental Technician Grade 1	Confidential	Waste	10	Complete – 4 day week
Landfill	Foreman	Confidential	Waste	47	Complete – Full time
TOTAL DAYS AVAILABLE				1049	

4.3 Training Requirements

The implementation of the Plan requires the development and maintenance of certain competencies within the team. A number of new staff have joined the Environment Department in late 2021 and 2022 including the following: Executive Scientist and Senior Executive Engineer (Q3/Q4 of 2021).

Both new staff have now completed the Certificate in Environmental Management with Sligo IT.

As outlined in Section 1.2 above a new Staff officer, Clerical Officer and Environmental Awareness Officer have joined the team.

Training courses identified by staff will be considered on a need basis throughout the year based on requirement to build skills in the team, availability and financial resources.

All training proposed/requested through PMDS will be facilitated where possible in accordance with the needs of the environment section, availability and financial resources.

4.4 Health and Safety

Carlow County Council believes that effective health and safety management supports our delivery of services to the people of Carlow.

We consider health and safety to be an integral part of what we do and will pursue continual improvement in performance through the setting of objectives and targets.

We recognize that while overall responsibility for health and safety lies with senior management, line managers and supervisors who have direct responsibility for activities and employees under their control. However, our employees have a role to play in ensuring their own safety, the safety of their colleagues, and the safety of the public while carrying out the activities of the County Council.

We are committed to:

- Preventing accidents and work-related ill health.
- Complying with statutory requirements.
- Assessing and controlling the risks that arise from our work and activities.
- Providing effective information, instruction and training.
- Providing a safe and healthy work environment.
- Ensuring safe working methods.
- Monitoring and reviewing systems and preventative measures to ensure they are effective.
- Developing and maintaining a positive health and safety culture through communication and consultation with employees and their representatives.

Carlow County Council has adopted a parent Safety Statement, latest revision is 2022. In addition to the parent safety statement and in recognition of the diverse nature of the services provided by the local authority, a number of individual site-specific statements have been prepared. These site-specific statements include statements for Powerstown and Kernanstown waste facilities. In addition to this, a number of safe operating procedures are utilised by the Environment Section in the performance of its enforcement duties. Routine H&S inspections are carried out throughout the year to ensure that operating procedures are being followed and are fit for purpose. All dangerous incidents/accidents and or near misses are reported and fully investigated.

5. PLANNED INSPECTIONS/OTHER ACTIVITIES FOR THE YEAR AHEAD

5.1 Planned Routine & Non-Routine Inspections

Table 9 below (and Appendix B) have been completed to detail all inspections planned (both routine and non-routine) to be carried out by Carlow County Council for the year ahead. The estimated time (days) per inspection is included (all time associated with carrying out each inspection including the time to write up the inspection report).

Comments have been provided to indicate which specific national and local priorities the planned inspections relate to. The Inspection Planning and Tracking tool developed by Carlow County Council includes a list of facilities/installations in operation in the County together with their individual risk rating. This plan has informed the planned inspections for the year ahead. The performance of previous years, RMCEI plan, and lessons learned, have been considered in preparing the inspection plan and detailed comments are provided in the Planned Inspections 2023 Tab.

Consideration of the available resources in Carlow has also been pivotal in preparing the plan for the year ahead and takes account of available staff, competency of staff and potential new staff who will fill existing vacancies. Where new staff join the organisation with no previous experience, they will only be considered at 50% capacity in year 1.

Table 9 Summary of Planned Routine & Non-Routine Inspections for the Year Ahead

Note that 'routine inspections' refers to planned inspections at authorised sites and 'non-routine inspections' refers to inspections of unauthorised sites, environmental complaints/incidents, etc. (rather than routine referring to scheduled work and non-routine referring to non-scheduled work).

Inspection Types	Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
Waste				
Total Routine Inspections end of year	761	As per tracking tool	178.25	As per tracking tool
Total Non-Routine Inspections end of year	49	As per tracking tool	21.85	Will be similar to 2022, however, number can vary depending on the volume of public complaints etc.
Total Inspections end of year	810		200.1	
Litter				
Total Routine Inspections end of year	1020	As per tracking tool	358.70	Similar to 2022. Assuming litter monitoring/quantification surveys are required in 2023. Judging of tidy towns not carried out by Environment Dept anymore. This is now done by Community Department – Pride of Place Competition.
Total Inspections end of year	1020		358.70	
Water/Wastewater				
Total Routine Inspections end of year	486	As per tracking tool	153.80	Will be similar to 2022
Total Non-Routine Inspections end of year	16	As per tracking tool	8	Will be similar to 2022, however, number can vary depending on the volume of public complaints etc.
Total Inspections end of year	502		161.80	
Air/Noise Inspections				
Total Routine Inspections end of year	76	As per tracking tool	29.8	As per tracking tool
Total Non-Routine Inspections end of year	5	As per tracking tool	2.5	Will be similar to 2022, however, number can vary depending on the volume of public complaints etc.

Inspection Types	Planned Inspections for Year	Estimate time per inspection & write up (days)	No. of Inspections Days for this Inspection Type	Local Authority Comments for Planned Inspections for the Year Ahead
Total Inspections end of year	81		32.3	
Producer Responsibility Inspections				
Total Routine Inspections end of year	88	As per tracking tool	33.7	As per tracking tool
Total Non-Routine Inspections end of year				This is not a requirement of RMCEI – not an inspection type
Total Inspections end of year	88		33.7	
Planning (Environmental) Inspections				
Total Routine Inspections end of year	218	As per tracking tool	162.75	This will be reduced in 2023 as referrals from Planning Department expected to be lower as Planning Dept asked not to refer matters that does not require comment from Env. Dept and also asked not to refer repeat type matters.
Total Non-Routine Inspections end of year				This is not a requirement of RMCEI – not an inspection type
Total Inspections end of year	218		162.75	

5.2 Outstanding Enforcement Actions & Complaints Requiring Resources for the Year Ahead

A number of enforcement actions and complaints being carried over to 2023. These have been captured in table 10 below.

Table 10 Outstanding Enforcement Actions & Complaints to be Closed Out

Inspection Type	No. of Inspections to close out in the Year Ahead	Estimate time per inspection+ write up (days)	Time for all Inspections (days)
Outstanding Complaints			
4.1.1 Litter (excluding fly tipping and illegal dumping)	5	0.5	2.5
4.1.2 Waste, non C&D. Includes fly tipping and illegal dumping	9	0.5	4.5
4.1.3 Waste, C&D.	1	0.5	0.5
4.2 Water/Wastewater	1	0.5	0.5
4.3 Air/Odour	0	0	0
4.4 Noise	1	0.5	0.5
Total	17		8.5
Outstanding enforcement Actions			
Warning Letters	0	0	0
Section Notices	1	1	1
Complaints	0	0	0
Court Cases	0	0	0
Etc.			
Total	1		1

5.3 Summary of Resource Requirements

Assessment of proposed planned (routine and non-routine) inspections for the coming year to help achieve National and Local objectives have been considered together with outstanding matters from the past year. Table 10 demonstrates that Carlow County Council has sufficient resources to complete the proposed inspection plan together with completing outstanding matters from the previous year.

Table 11 Summary of Inspections to Complete and Resources Required for the Year Ahead

Inspection Type	No. of Inspections Planned for the Year Ahead	Total Time for all Inspections (days)
Total Routine Inspections – (obtained from completed rows A-F of Section 6 of the RMCEI Return)	2649	917
Total Non-Routine Inspections end of year – (obtained from completed rows A-F of Section 6 of the RMCEI Return)	70	32.35
Outstanding Enforcement Action & Complaints to be Closed out – (outlined in Table 10)	18	9.5
Totals	2737	958.85
Total Available Resources (Days) – (outlined in section 4 Table 8 of the Plan)		1049

6. PLAN REVIEW MECHANISMS

RMCEI as the name suggests, is a recommended plan which is subject to review and revision throughout the period of its implementation. Following a year during which circumstances changed more than any year before we can clearly see the need for regular review. Ongoing review and realignment allows us to ensure that targets and goals are realistic and achievable within in the time frame given and available resources. All these factors are a moveable feast.

To ensure the viability of the plan and that issues are addressed as quickly as they arise, a number of plan review mechanisms will be in utilised for 2023. These include:

- New Inspection Planning and Tracking Tool (includes risk rating) Excel Sheet (2023)
- Regular Environment Team Meetings to agree weekly programmes and adapt to evolving situations & WERLA/EPA requests.
- Continuous recording of data on all databases to include Carlow County Council Complaints, Notices & Warnings, and Inspections databases. Monthly assessments to ensure all data is up to date by Complaints Manager, followed up by targeted emails where an incomplete or outstanding progress update is required. This data will inform RMCEI meetings.
- Regular monthly/quarterly RMCEI meetings including planning meetings. The template for implementation review appended in Appendix C will be used to track progress at meetings together with the tracker template in Appendix C.
- Monthly/Quarterly RMCEI progress meetings will be a trigger for action. If any area of the plan is below planned output but considered to be viable, then resources will be directed to align activities with the targets. If a circumstance arises where more than one area is behind target priority will be given to activities with a statutory basis, followed by any inspections related to specific national enforcement priorities and finally any other inspection types.
- Liaison/regular updating with Management Team, Cross Functional Team, The Elected Members. Updated information provided in CE monthly report on environmental inspections and enforcement statistics together with the latest environmental awareness updates.
- Co-ordinating with Departments outside the organisation including EPA, Gardai Siochana, Departments of Local Government/Agriculture, WERLA, Teagasc, CARO, NWCPO, NTFSO.
- Co-operating with and learning from our neighbouring enforcement counties.

It is anticipated that regular actions will be set and recorded at meetings to ensure continued and clearly defined progress. Proposed progress review meetings which will inform and chart the implementation of the RMCEI 2023 Plan are detailed below in Table 12 including frequency and purpose. Also included are a number of other mechanisms that will inform and co-ordinate progress on the implementation of the plan.

<It is key to successful implementation that a plan is not considered as an end point but rather as a start to implementation. The plan is also only good until it is put into action and the external environment will impact on the plan. So, monitoring the implementation of the plan is not just to see if the targets for inspections have been met or to check to see if enforcement actions are being followed through, but about understanding how the real-life external environment is impacting on the initial plan. Many elements of a plan may change, a staff member may leave or a visit might show that there is a major non-compliance issue that will take time to rectify or a non-routine inspection may unearth a situation that has the potential to affect the environment greatly and consequently needs to be dealt with as a

priority. These changes will impact on the plan but should also be used as learning so that the following year's plan is more realistic.

This information is also valuable to allow for the control of plan implementation. It will tell you that you have achieved good progress in some areas and are behind in other areas. This information should be a trigger for action. If the plan is still considered to be valid then resources should be directed to bringing activities in line with the targets. As a rule of thumb if a number of areas are behind target those that have a statutory basis should be brought up to target first, followed by any inspections related to specific National Enforcement Priorities and finally any other inspection types. This information should also be discussed at any relevant team meetings so that any related inspections being done by various team members can be considered if the plan targets are to be changed.

In addition, as part of the EPA's Section 63 oversight and implementation of the local authority performance framework, all changes made to planned targets may require verification during OEE audits by checking that appropriate review records and meeting minutes are in place.

Table 12 Summary checklist of plan review mechanism

Question	Yes	No
Q1 Have progress implementation meetings been planned to be undertaken to assess Plan progress through the year?	Yes	
Q2 Will the Director of Services, Senior Engineer, Senior Management and Environment Strategic Policy Committee be informed of Plan progress (on a monthly or quarterly basis).	Yes	
Q3 Are objectives for the delivery of the RMCEI Plan incorporated within staff PMDS Team Development Plans?		No
Q4 If aspects of the Plan need to change (i.e. achieved good progress in some areas and are behind in other areas), as a result of a quarterly review, is there a mechanism in place to implement the change?	Yes	
Q5 Will monitoring of the progress of the Plan be documented (i.e. monthly/quarterly monitoring reports, preparation of minutes and circulation of same in relation to any progress meetings)?	Yes	